

# United States District Court

for the  
Western District of New York

United States of America

v.

Case No. 24-mj-1069

DANIEL RICHTER

*Defendant*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Between on or about December 24, 2023 and on or about February 29, 2024, in the Western District of New York, the defendant, DANIEL RICHTER, with the intent to harass and intimidate another person, that is, E.B., used an electronic communication system of interstate commerce and a facility of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to E.B.

All in violation of Title 18, United States Code, Section 2261A(2)(B).

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.



*Complainant's signature*

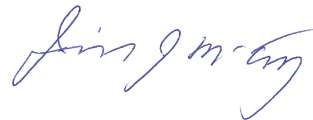
BRIAN K. BLOOM  
TASK FORCE OFFICER  
FEDERAL BUREAU OF INVESTIGATION

*Printed name and title*

Sworn to before me and signed telephonically

Date: March 13, 2024

City and State: Buffalo, New York



*Judge's signature*

HONORABLE JEREMIAH J. McCARTHY  
UNITED STATES MAGISTRATE JUDGE

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF  
APPLICATION FOR A SEARCH WARRANT**

STATE OF NEW YORK    )  
COUNTY OF ERIE        )       SS:  
CITY OF BUFFALO        )

I, **BRIAN BLOOM**, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I have been a Deputy Sheriff with the Niagara County Sheriff's Office in Lockport, New York since 2010. I am currently a Task Force Officer with the Federal Bureau of Investigation ("FBI"), Buffalo Field Office, and work cases associated with the Violent Crimes Against Children program, which targets individuals involved in the online sexual exploitation of children. I began this assignment in January of 2022. As part of these duties, I have become involved in the investigation of suspected violations of Title 18, United States Code, Sections 2251, 2252, 2252A, 2422, and 2423. I have participated in various FBI mandated and volunteer training in the area of child pornography, as defined in Title 18, United States Code, Section 2256(8), and child exploitation, including in the investigation and enforcement of federal child pornography laws in which computers are used as the means to receive, transmit, distribute, access, and store child pornography. As a Deputy Sheriff, I have investigated cases involving, among other things, threats and stalking.

2. I offer this affidavit in support of a criminal complaint charging DANIEL RICHTER ("RICHTER") with violation of 18 U.S.C. § 2261A (Cyberstalking). The statements in this affidavit are based upon my personal knowledge, my review of investigative and litigation materials from this and past criminal matters, conversations with witnesses and

other members of law enforcement, and on my training and experience as both a Niagara County Sheriff's Deputy and a Task Force Officer with the FBI. Because I offer this affidavit for the limited purpose of seeking a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts necessary to establish probable cause to believe that RICHTER knowingly violated Title 18, United States Code, Section 2261A.

### **PROBABLE CAUSE**

**A. RICHTER's previous conviction for cyberstalking and communication of interstate threats toward the Victim.**

3. On November 30, 2018, Task Force Officer ("TFO") Jeffrey McAuliffe received information from Niagara County ADA Holly Sloma that RICHTER had been engaging in an ongoing course of unwanted communications with an adult victim in Niagara County, New York ("VICTIM"). ADA Sloma further advised that RICHTER, who was last known to reside in Colorado, contacted the VICTIM through phone calls and emails and indicated that he was traveling to Newfane, New York to see the VICTIM. Several of the communications were sexual and/or threatening in nature.

4. According to my review of past investigative reports and pleadings, the VICTIM first met RICHTER when RICHTER was a student in a class that the VICTIM taught at the University at Buffalo in 2002. The VICTIM reported that RICHTER began sending emails to her, which became increasingly bizarre as the semester progressed. The VICTIM said that RICHTER waited until most other students left at the end of class and would then watch the VICTIM closely as she gathered her items to leave. When the

VICTIM attempted to converse with RICHTER, he would not reply but would stare at her, making her uncomfortable. On one occasion, RICHTER followed the VICTIM into the parking lot after class, which made the VICTIM fear for her safety. NOTE: On March 7, 2024, I participated in an interview with the VICTIM in which she reported that on numerous occasions she asked other male students to escort her to her vehicle after class, and that RICHTER would follow behind them regardless. After the course ended in May 2002, the VICTIM moved out of the area at which time she also changed her email address.

5. In August 2007, Dr. Steve Shanley, a therapist at CMH Counseling in . Williamsville, New York contacted the VICTIM and advised her that she should not take RICHTER on as a client again because he seemed to be fixated on her. The VICTIM explained that she had never been his psychologist and only knew him from the semester she taught at the University at Buffalo. Dr. Shanley went on to tell the VICTIM that RICHTER seemed to be obsessed with her and that RICHTER knew that the VICTIM was working as a school psychologist in the Newfane School District.

6. In December 2007, the Victim began receiving unwanted communications from RICHTER. These communications were in the form of hang-up phone calls, voice messages, and post cards sent to the VICTIM. From December 2007 to April 2008, the Niagara County Sheriff's Department responded to the VICTIM's complaints, as did the Newfane School administrators.

7. In April 2008, as a result of the continued unwanted and harassing communications, RICHTER was arrested and charged with Stalking in the Fourth Degree and an Order of Protection was issued by the Court.

8. On October 18, 2018, the VICTIM reported to the Niagara County Sheriff's Department that she received an envelope addressed to her at her place of employment, Newfane Middle School. The return address on the envelope, which was handwritten, read: Daniel Richter 979 W. Morehead Circle Unit C, Boulder, Co, 80305. A United States Postal Service tracking history was conducted on the package, and it established that the package was first tracked on October 15, 2018, in Lafayette, CO, 80026. The package contained a handwritten letter, an article, and 3 DVDs.

9. On October 18, 2018, a few hours after receiving the first package, the VICTIM reported receiving another package. This package was also addressed to the VICTIM from RICHTER, with all the same address information as the first package. This package contained similar items to the first package, including a letter, 5 DVDs, and a CD.

10. On November 7, 2018, the VICTIM called the Niagara County Sheriff's Office and reported that she received several voice messages from RICHTER between November 1, 2018, and November 7, 2018. At that time, the VICTIM had received approximately 14 voicemails from RICHTER. In those messages, RICHTER mentioned the name of the VICTIM's child as well as some of her extended family members. Additionally, RICHTER's messages were described as "agitated," as his voice often became louder, and he began using increasingly more vulgarities. On November 8, 2018, and November 9, 2018, the VICTIM

called the Niagara County Sheriff's Office to report a dozen more similar calls and voice messages from RICHTER. These messages caused considerable distress for the VICTIM, who feared for her safety. The VICTIM cited RICHTER's message where he indicated that he had "been arrested 10 years ago and he's willing to risk it happening again."

11. On November 13, 2018, the Newfane Town Court issued a warrant for RICHTER's arrest for Stalking in the Third Degree, and an Order of Protection was issued.

12. On November 26, 2018, the VICTIM reported that she had received an additional 156 voicemails and over 150 emails from RICHTER. The voice messages appeared to be increasingly sexual and/or threatening in nature. RICHTER stated that he was on his way to Newfane and that he would be arriving there sometime around Christmas. In one of the messages, RICHTER said "if you wanna live, never leave my side." In a follow-up message, he stated "I can't stress this enough, when I do show up around Christmas, if you want to live, never leave my fucking side." In an email sent on November 25, 2018, RICHTER wrote "You wouldn't even talk to me AFTER 50 plus messages. You wouldn't even damn talk to me. It's a phone 9706891203." Other emails sent from RICHTER on November 25 and 26 of 2018, stated:

- "Chick needs a NICE sweaty horse fuck" (sent at 8:08am);
- "Daniel Richter proctologist. I'm gonna be the first buttpirate!!!!" (sent at 8:52pm);
- "Early December I'll be in town" (sent at 8:58pm);
- "Would it be ok if I show up to the school when I do. I'll get a quiet place for the two of us." (sent at 8:59pm);

- “I blame you of course bitch. I’m stuck in Iowa because of your damn ass...” (sent 12:18am);
- “I will get you for this [VICTIM] (you sneaky player)” (sent 12:20am);
- “I went to jail for you all you do is hate and ignore me, I went to jail for you yet here I am again” (sent 12:28am);
- “And use you like a whore” (sent 1:15am).

13. On November 29, 2018, local law enforcement arrested RICHTER in a hotel parking lot in Illinois. RICHTER was returned to Newfane Town Court for arraignment.

14. On December 28, 2018, RICHTER was charged in United States District Court and accused of violating Title 18, United States Code, Section 2261A (Stalking) and 875(c) (Threatening Interstate Communications). *See* Case No. 18-mj-5299.

15. On September 10, 2020, RICHTER was sentenced by United States District Judge John L. Sinatra to a term of twenty-four months for violation of Title 18, United States Code, Section 2261A. *See* Case No. 20-CR-67.

**B. RICHTER’s renewed course of cyberstalking and communication of interstate threats to the Victim.**

16. After RICHTER completed his term of supervised release on the above-referenced federal conviction, he renewed his attempts to contact the Victim. For example, between December 24, 2023, through December 25, 2023, the victim received two voice messages from 626-XXX-9171 to her Google voice number 716-638-XXXX. Messages are forwarded through Google Voice to a designated phone number of the system client. The system is utilized by business professionals so that they can be reached without providing their

personal phone number to the public.

17. Between December 25, 2023, through December 26, 2023, the victim received approximately sixty-three voice messages from phone number 323-XXX-9963 that appear to be from RICHTER. For example, on December 25, 2023, as translated by Google Voice;

“I f\*\*\*\*\* hate it. I f\*\*\*\*\* hate it. The guy who invented Amazon.com is going to save the world. I f\*\*\*\*\* have it. I f\*\*\*\*\* have it too. Good too. Good too much of a genius too. Good too good too good. We are the world well the grunt looks so Sergeant fast And Michael Jackson’s in the Diana Ross is that in the industry that’s called networking. I f\*\*\*\*\* have it. I really put your soul action with you. The Supreme geniuses You know, it’s amazing, isn’t it? How like someone can build a bomb then? They watch Dateline on own NBC or something. You know. Who set the status of his life? Yeah, there has to be a penalty in a world where a f\*\*\* doll is idea. Sweetheart, I sympathize. And now but you know. I’m not just interested in your mud flaps. So I’m not the whole meaning you. Butt cheeks they will not. And I must live on.”

18. Between February 4, 2024, and February 6, 2024, the victim received approximately thirty-one voice messages from RICHTER using phone number 213-XXX-9992. The messages were similar as those previously received. For example, on February 4, 2024, as translated by Google voice;

“serial killer mason over there Helios I’m pretty clever. Despite of my dominant why not Natalie means to be the color of Minka You kill. And with a seriously who do you need? That’s the point, you know. Seriously, babe Just you and me you’re safe, you know. It even share room with different beds. There are ways believe me. Again You don’t want to happen. You don’t want me to lick you quit now. What do you want? Do you want? So what do you want? It kind of fish. I’m Daniel f\*\*\*\*\* Rick. If you want to arrest me arrest me up Daniel f\*\*\*\*\* break down your God damn phon. I take all the risk. But you have the power came in alone not to be abused. Houdini Can’t you do the right thing? Ask it all right.”



19. On or about February 6, 2024, Richter began to use turropoumbopo@gmail.com to email the victim at her personal email address. Between February 6, 2024, and the date of this affidavit, RICHTER appears to have sent over 600 emails to the Victim. The emails range from incoherent rambling to sexual and/or threatening comments directed at the Victim. Some of the emails include attached pornographic images and RICHTER's mug shot. None of the communications were wanted by the Victim. For example, in one email RICHTER wrote:

It's meant to be a sport to watch me fall apart, and "Dr."  
 [VICTIM] will never stop-got a real taste for it now I've heard  
 pearl jam's why go on song I know the score. Treason.  
 Thanks for the love I've seen the movie in the company of men  
 (recommend to [VICTIM]) I know the score.  
 I've seen the Dixie chicks not ready to make nice video I know  
 the score. It's meant to be the cruelest sport to me for the last 20  
 plus years with [VICTIM] monster, I take you all to fucking  
 hell, mind time  
 You reap what you sow.  
 Peace be with you, and also with you peace sign middle finger  
 sign language. Signs sings everwre is signs member that from  
 the band Tesla unplugged.  
 With friends like you who needs enemies "thanks" I've seen  
 endledd love I know the score,  
 "Sincerely"  
 Daniel Richter

20. Between February 8, 2024, and February 9, 2024, alone, the victim received over fifty email communications from RICHTER. For example, on February 8, 2024, at 3:45 p.m., RICHTER wrote

Hey -----,<sup>1</sup> your devil bitch mommy replaced my small pencil  
 with someone else's.. if you know what I mean. She was  
 always complaining about my small pencil in class, NOW she  
 has years.  
 "Thanks" [VICTIM]

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<sup>1</sup> I have redacted the first name of the Victim's minor son to protect the Victim's privacy.

21. On February 9, 2024, at 2:29:33 a.m., RICHTER wrote:

We still live in the king's law world [VICTIM]. All it takes is one asshole from the federal courts to monitor this and you or I or both will be in federal prison in reality very soon, it will create total chaos and deaths to all kinds of more people if you or (more likely) I go back to federal or state prison. I'm wide open here cunt. We are much safer together now than apart. Help' help' help' your whole family will be annihilated if I go back IN REALITY, as well as millions of others that won't be if I get thrown back to that hell. Stop your cosmically insane philosophy of ignoring my messages. It will save millions of lives  
DON'T PUSH

22. The Victim has continued to receive emails and/or Google voicemails from RICHTER on a near daily basis, often receiving tens of unwanted communications per day. Over time, these communications have become more threatening, with RICHTER threatening to come to see the victim in person and threatening to kill her. Approximately 600 emails have been received as of February 29, 2024. For example:

February 23, 2024 at 7:27:47 AM

You know I was innocent when you sent me to prison,  
[VICTIM] can't you just come to the plate and talk to me.  
[VICTIM] I'm not an ouger,  
Do you think we have some chemistry at all. This is very unprofessional or simply "not nice" to just ignore me  
[VICTIM] let's help each other and talk things out, isn't that the therapist way?  
[VICTIM] I love but I'm frustrated  
I'm calling it a night.  
You're not used to a man's man, well I'm not used to being ignored.  
[VICTIM] listen to waits time song  
[VICTIM] with love sweetheart "don't be scared"  
-Daniel Richter

February 26, 2024 at 3:36 AM

[VICTIM] if I ever "eaten your face off or bit your head off face to face" why do you still have it?

I'm very "shy" around you face to face.  
..something has to change here,  
I'll try to make it down there but I'm "afraid" and "shy" I'm  
after the government not "Dr" love [VICTIM].

February 26, 2024 at 7:54AM

You do realize that I'm "scared shitless" of you face to face.  
[VICTIM] you "know" me  
Daniel Richter to [VICTIM] "twatfur"  
"Twat"..I said what "tha's my story and I'm stickin' to it)  
You do realize that I'm "scared shitless" of you face to face.  
[VICTIM] you "know" me.  
DVD recommendations:  
The Charles Bukowski tapes (2dvds available on ebay,  
Amazon) sometimes referred to as the Charles Bukowski  
interviews. By barbet Schroeder  
Finigans wake is my favorite book of all time  
Charles Bukowski BAR NONE is my favorite author of all time  
See you soon face to face "twatfur"

February 29, 2024 at 11:18:19 AM

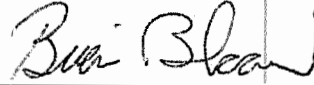
You don't want to get in the ring with my rabid artists.  
Their/I'm going to kill you if you don't talk to me today.  
Doctor "death" monster.

23. On March 7, 2024, I participated in a telephonic interview with the Victim.  
She reported that these unwanted communications caused her significant emotional distress.

### CONCLUSION

58. Based upon the information detailed herein, I submit that there is probable  
cause to believe that DANIEL RICHTER violated 18 U.S.C. § 2261A(2)(B)  
(cyberstalking). I further request that this complaint and affidavit be sealed until such time

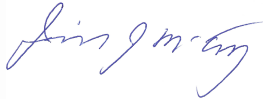
as RICHTER can be located and arrested. Premature disclosure of this complaint and affidavit would provide RICHTER an opportunity and motive to evade apprehension.



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Brian Bloom  
Task Force Officer  
Federal Bureau of Investigation

Sworn to and subscribed telephonically  
this 13th day of March 2024.



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HONORABLE JEREMIAH J. McCARTHY  
UNITED STATES MAGISTRATE JUDGE